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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,)	Case No. CR 16-0115 WHA
)	
15 Plaintiff,)	STIPULATION AND PROPOSED ORDER
16 v.)	EXCLUDING TIME FROM AUGUST 23,
)	2016, TO SEPTEMBER 20, 2016
17 ROBERT COLE FUHRMAN,)	
)	
18 Defendant.)	

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20 The United States of America, by and through Assistant United States Attorney Brian R.
21 Faerstein, and defendant Robert Cole Fuhrman, by and through defense counsel Geoffrey Hansen,
22 hereby stipulate that, with the Court's approval, the time between August 23, 2016 and September 20,
23 2016 is excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), for effective
24 preparation of counsel.

25 The parties appeared before this Court on August 23, 2016, at 2:00 p.m., for an initial status
26 conference in this proceeding. The government represented that it had made an initial production of
27 discovery to defendant following his arraignment on August 19, 2016 upon the request of defense
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counsel, and anticipated producing additional discovery upon entry of a protective order by the Court. The parties are meeting and conferring on a proposed stipulation and protective order for the Court's consideration. Upon the request of the parties, the Court set a further status hearing in this matter for September 20, 2016. In light of the government's recent production of discovery and its anticipated additional production pursuant to a protective order, the parties agreed that it would be appropriate that time be excluded under the Speedy Trial Act between August 23, 2016 and September 20, 2016, for effective preparation of counsel, under 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties stipulate that the failure to exclude would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence under 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate that the requested exclusion of time, from August 23, 2016 to September 20, 2016, is in the interests of justice and outweighs the best interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO STIPULATED.

Dated: August 25, 2016

BRIAN J. STRETCH

United States Attorney

_____/s/_____

BRIAN R. FAERSTEIN

Assistant United States Attorney

Dated: August 25, 2016

_____/s/_____

GEOFFREY HANSEN

Attorney for ROBERT COLE FUHRMAN

Attestation of Filer

In addition to myself, the other signatory to this document is Geoffrey Hansen. I hereby attest that I have his permission to enter a conformed signature on his behalf and to file this document.

Dated: August 25, 2016

_____/s/_____

BRIAN R. FAERSTEIN


Assistant United States Attorney

[PROPOSED] ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between August 23, 2016 and September 20, 2016, would unreasonably deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between August 23, 2016 and September 20, 2016, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, IT IS HEREBY ORDERED that the time between August 23, 2016 and September 20, 2016, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: August 25, 2016.


HONORABLE WILLIAM ALSUP
United States District Judge